

U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS
DOCKET NO. 05-10033 NG

LORI ANN MORAN, PLAINTIFF VS. ANDREW DIPASQUA, MICHAEL SANBORN,
WILLIAM F. GAY, III and the ONSET FIRE DISTRICT, DEFENDANTS

AFFIDAVIT OF MARGARET A. ISHIHARA IN SUPPORT OF MOTION FOR
ENLARGEMENT OF TIME

I, Margaret A. Ishihara, hereby state that:

1. I am an attorney at law licensed to practice in the Commonwealth of Massachusetts, with offices at 86 Church St., Mattapoisett, Massachusetts 02739, and I am counsel of record for the Plaintiff Lori Ann Moran in the above referenced case.
2. Inadvertently, I omitted page 11 from the copy of the transcript of the June 30, 2004 Onset Board of Water Commissioners meeting at which the Board voted to terminate the Plaintiff from employment. The copy of the transcript was attached to my Affidavit previously filed with the court with the Plaintiff's summary judgment opposition materials. A copy of page 11 is attached to this Affidavit as Exhibit A.
3. I had scheduled an appointment for June 2, 2006 with James Franklin, an Onset Firefighter, and witness in this case, for the purpose of having him review and sign an Affidavit. Mr. Franklin did not make that appointment, and he advised me later that he had an emergency at work (flooding in one of the buildings that he maintains) on that day.
4. I rescheduled Mr. Franklin's appointment for Saturday, June 3, 2006, and he signed the Affidavit which is filed contemporaneously with the Motion for Enlargement of Time.

Signed under the pains and penalties of perjury this 7th day of June 2006.

/Margaret A. Ishihara
Margaret A. Ishihara

CERTIFICATE OF SERVICE

I hereby certify that I have served the within document by mailing a copy first class mail postage pre paid to:

John J. Cloherty, III
Pierce, Davis & Perritano, LLP
Ten Winthrop Square
Boston, MA. 02110
Telephone: (617) 350-0950

Date: 7 June 2006

/Margaret A. Ishihara
Margaret A. Ishihara

Onset Brd of Water Commisioners
6/30/06 Meeting

11

1 And she turns around and, um, says -- well, she -- well,
2 she actually stood up, and she says, "Why? Are you going
3 fire me? Are you firing me?" And then he's like, "Well,
4 why don't you just go home?" And it was like -- it was
5 just before four -- five minutes, ten minutes to four.
6 And, um, he's asking her, "Just go home, and I'll make sure
7 you get paid." And, um, she says, "Why? Are you firing
8 me? Are you firing me?" She sat back down, and she made a
9 reference like, "I have enough stuff on you to take care of
10 you if you're going to fire me." Billy [inaudible] the
11 office [inaudible]. Now, at this point, it was 4 o'clock.
12 Jay and Chris were getting ready to go out the door; Chris
13 was locking the door and setting the alarm. And I said to
14 Lori, "Well, let's go outside," because she wanted somebody
15 to stay with her to see if she's fired, because she didn't
16 leave when Billy asked her to leave. Anyway, I said to
17 her, "I'll stay, Chris. Just lock the door." I looked in
18 the bathrooms, Billy [inaudible] wasn't there. I, um, went
19 outside with Lori, and we stood out front. And I said to
20 her, "I think Billy's walking home. Why don't we just
21 leave?" She says, "No, I know he's around here." I
22 started to walk down the hill; I got about as far as
23 [inaudible] the stone wall [inaudible] there. And then she